

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION IX

75 Hawthorne Street San Francisco, CA 94105

July 18, 2002

BRAC Environmental Coordinator
Base Realignment and Closure, Environmental Division
Attn: Mr. Dean Gould
P.O. Box 51718
Irvine, CA 92619-1718

RE: Draft Final Site Closure Report, Vadose Zone Remediation, OU 2A, IRP Site 24, Marine Corps Air Station, El Toro, dated June, 2002

Dear Mr. Gould:

EPA has reviewed the draft final closure report for Site 24, VOC source area. The report presents results of the vadose zone remediation conducted at Site 24 and recommends closure of the vadose zone at Site 24. EPA's comments dated August 14, 2001 have been adequately addressed in the report.

The Remedial Action Objectives stated in the Interim ROD for Site 24, vadose zone are:

- Reduce concentrations of VOCs in the VOC source areas to prevent or minimize further degradation of the shallow groundwater unit above the maximum contaminant levels (MCLs) for drinking water.
- Continue vadose zone remediation until VOC soil gas concentrations are below the established threshold concentrations (concentrations capable of contaminating the shallow groundwater unit above MCLs).

The results presented in the report demonstrate that these objectives have been met. In addition, to address EPA's concerns regarding potential continued off-gassing from the groundwater, the Navy has agreed that they will not decommission the soil gas extraction wells until an evaluation of whether continued use of the soil vapor extraction wells would enhance the groundwater remedy recently selected in the ROD for Sites 18 and 24. This evaluation will be conducted during the Remedial Design/Remedial Action process for Sites 18 and 24.

As such, EPA concurs with the Navy's recommendation of closure for the vadose zone at Site 24.

If you have any questions, please call me at (415) 972-3012.

Sincerely,

Nicole G. Moutoux

Project Manager

Federal Facilities Cleanup Branch

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MCAS El Toro

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